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8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 REZA KHOSRAVANI,

12
13 Plaintiff,

14 v.

15 MICHAEL CHERTOFF, Secretary,
16 Department of Homeland Security; EMILIO
GONZALEZ, Director of U.S.C.I.S; PAUL
17 PIERRE, District Director of U.S.C.I.S.;
MICHAEL MUKASEY, U.S. Attorney)
18 General,

19
20 Defendants.

Case No. 08cv0220-W (CAB)

JOINT MOTION TO EXTEND TIME TO FILE
REPLY BRIEF

No Oral Argument Pursuant to Local Rule

21 COME NOW THE PARTIES, Reza Khosravani, by and through his counsel, Robert A. Mautino,
22 and Michael Chertoff, Secretary, Department of Homeland Security, et al., by and through their counsel,
23 Karen P. Hewitt, United States Attorney, and Megan Callan, Assistant U.S. Attorney, and hereby jointly
24 request an extension of time for Defendants to file their reply brief, Reply in Support of Defendants'
25 Motion to Dismiss or Alternatively to Remand to U.S. Citizenship & Immigration Services.

26 Defendants filed their Notice of Motion and Motion to Dismiss or Alternatively to Remand to
27 U.S. Citizenship & Immigration Services, along with supporting Memorandum of Points and Authorities
28 and attached exhibits (the "Motion") on April 7, 2008. (Doc. no. 3).

1 The Court set May 12, 2008 for the hearing date on the Motion. According to CivLR 7.1(e)(2),
 2 Plaintiff's Response in Opposition to the Motion was due no later than April 28, 2008. Plaintiff filed his
 3 Opposition on May 4, 2008. Defendants do not object to the untimely filing but request an extension in
 4 order to reply to the Opposition.

5 The parties have not previously requested such an extension. The parties have agreed that
 6 Defendants may file their Reply in Support of Defendants' Motion to Dismiss or Alternatively to Remand
 7 to U.S. Citizenship & Immigration Services on or before May 12, 2008. The parties do not request oral
 8 argument pursuant to Local Civil Rules, and accordingly, the parties believe that this delay in filing will
 9 not cause inconvenience or prejudice to any party or to the Court.

10 For the foregoing reasons, the parties jointly request that Plaintiff's Opposition (Doc. no. 4) be
 11 deemed timely filed and that the time for filing of Defendant's Reply in Support of Defendants' Motion
 12 to Dismiss or Alternatively to Remand to U.S. Citizenship & Immigration Services be extended until
 13 May 12, 2008.

14
 15 Dated: May 5, 2008 s/ Robert A. Mautino
 16 Counsel for Plaintiff
 E-Mail: Bob@mautino.org

17 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
 18 of the United States District Court for the Southern District of California, I certify that the content of this
 19 document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Robert
 20 A. Mautino to affix his electronic signature to this document.

21 Dated: May 5, 2008 Respectfully submitted,
 22 KAREN P. HEWITT
 United States Attorney
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s/ Megan Callan
 24
 MEGAN CALLAN
 25 Assistant U.S. Attorney
 Counsel for Defendants
 26 Email: Megan.Callan@usdoj.gov
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